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May 13, 2022

Honorable Sidney H. Stein
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Roger Thomas Clark
15-cr-866 (SHS)

Dear Judge Stein:

I attach a letter drafted by my client Roger Clark and typed by me at his request. I submit this for the Court's consideration. While I continue to be Mr. Clark's attorney, he has sought since March 12, 2022, to represent himself. A decision has been delayed on this issue for several reasons. The case was transferred to Your Honor when Judge Nathan assumed her position on the Second Circuit. I contracted COVID. Conflict counsel contracted COVID. Given these delays, I ask that the Court consider Mr. Clark's requests.

Mr. Clark seeks to have an investigator assigned by the Court to come to the room in the medical facility where Mr. Clark is now being treated and take video footage of his conditions of confinement. If the Court grants the requests and signs the Order I would seek funds to retain an investigator through the e-voucher system.

I make this request through letter motion with notice to the government rather than *ex parte* through the ECF system as permitted by the CJA Plan because I will need an Order to have an investigator admitted to Mr. Clark's (private) room. While Mr. Clark is a medical facility, as an unsentenced prisoner, he is the custody of the United States Marshal's Service.

Respectfully submitted,

_____/s/_____
Stephanie Carvlin
Counsel for Roger Clark

cc: AUSA Michael Neff (via ECF)

I ask that the Court issue an Order that authorizes an investigator to come to the hospital room where I am being held to videotape me. I need to have private, privileged conversations with the investigator. I need to be permitted to take my leg irons off or put them on for the purposes of this video. The reason I ask for this is to document the conditions of my confinement that make it almost impossible for me to do physical therapy and dangerous for me move about the room and have access to my legal work. I ask that the Order also direct that those guarding me return a new pair of underwear that had previously been approved (the type of which I was allowed to wear for almost six months) for me to wear during the videotaping. I request that the Order also permit the investigator to interview on or off camera any willing members of hospital staff.

The Order should also authorize the video to show me in my entirety (meaning my face as well as my body). I expect that this video will be sealed and made available only to the parties, my consular representative, and the Court, given that it documents my medical condition.

Counsel is writing this letter. I am unable to write this letter myself and am unable to work on my sentencing because I still don't have a pen.

Thank you.

Roger Clark